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Attorneys for Defendant
SUNVALLEYTEK INTERNATIONAL, INC.

Attorneys for Plaintiffs
INES BURGOS and MONGKOL
MAHAVONGTRAKUL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

INES BURGOS, and MONGKOL
MAHAVONGTRAKUL, individually and on
behalf of other similarly situated individuals,

Plaintiffs,

v.

SUNVALLEYTEK INTERNATIONAL,
INC.,

Defendant.

Case No. 4:18-cv-06910-HSG

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER SUSPENDING CASE
MANAGEMENT ORDER PENDING
FINALIZATION AND COURT
APPROVAL OF SETTLEMENT**

1 Plaintiffs Ines Burgos and Mongkol Mahavongrakul (“Plaintiffs”) and Defendant
 2 Sunvalleytek International, Inc. (“Sunvalleytek” or “Defendant”) (collectively, “the Parties”)
 3 have agreed upon terms of settlement of this case. The Parties, through their respective counsel,
 4 have entered into a term sheet setting forth the settlement terms. They are presently in the
 5 process of preparing a more detailed settlement agreement. The settlement terms include a
 6 requirement that a motion for Court approval of the settlement agreement, including certification
 7 of a class and approval of certain specific terms, be filed, along with an appropriate opportunity
 8 for Defendant to oppose certain issues (with regard to certain issues, the Parties leave it to the
 9 Court to make a determination based on the evidence presented by the Parties in the motion).
 10 The detailed settlement agreement must be finalized prior to bringing the motion.

11 Accordingly, the Parties hereby stipulate, by and through their counsel, and jointly
 12 request that the Court suspend the present case management order and schedule (Dkt. 41) to
 13 allow the settlement agreement to be finalized. The Parties further stipulate that they will provide
 14 a joint report to the Court by May 15, 2020, stating the status of finalizing the settlement and
 15 filing the motion.

16 **IT IS SO STIPULATED** through Counsel of Record.

17 Respectfully submitted,

18 Dated: March 17, 2020

FINKELSTEIN, BLANKENSHIP, FREI-PEARSON
& GARBER, LLP

20 By: /s/ D. Greg Blankenship

21 D. Greg Blankenship

22 *Attorneys for Plaintiffs*
 23 *INES BURGOS and MONGKOL*
 24 *MAHAVONGTRAKUL*

1 Dated: March 17, 2020

GCA LAW PARTNERS LLP

2 By: /s/ Kimberly A. Donovan

3 Kimberly A. Donovan

4 *Attorneys for Defendant*
5 *SUNVALLEYTEK INTERNATIONAL, INC.*

6
7 **[PROPOSED] ORDER**

8 PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that:

9 The Parties' request to suspend the present Case Management Schedule to allow the
10 Parties to finalize their settlement agreement and file a motion for class certification and
11 approval of the settlement is hereby GRANTED. The Parties shall provide a joint report to the
12 Court by May 15, 2020, stating the status of finalizing the settlement and filing the motion.

13
14 Dated: _____, 2020

15 _____
16 Honorable Haywood S. Gilliam, Jr.
17 United States District Court Judge
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ATTESTATION

I, Mario M. Choi, am counsel for Plaintiffs Ines Burgos and Mongkol Mahavongtrakul in this action. I am the registered ECF user under whose name and password this STIPULATION AND [PROPOSED] ORDER SUSPENDING CASE PENDING FINALIZATION AND COURT APPROVAL OF SETTLEMENT is being filed. Pursuant to Civil Local Rule 5-1(i), I attest that the concurrence in the filing of this document has been obtained from each of the other signatories.

Executed this 17th day of March, 2020, at Oakland, California.

/s/ Mario M. Choi

Mario M. Choi